

United States District Court
Southern District of Texas
FILED

AO-91 (Rev. 8/01) Criminal Complaint

OCT - 7 2015

UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Case Number: *M-15-1733-M*Javier LARA
YOB: 1995 POB: USC
Citizenship: USC

I, the undersigned complainant state that the following is true and correct to the best of my

Knowledge and belief. On or about October 6, 2015 in Hidalgo County, in
(Date)
the Southern District of Texas Defendant(s) did,

Did knowingly attempt to import approximately 10.68 kilograms of cocaine, a schedule II controlled substance, into the U.S.

in violation of Title 21 United States Code, Section(s) 952.I further state that I am a(n) Special Agent And that this complaint is based on the
Official Title

following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No*Approved by*
*Robert I. [Signature]**[Signature]*
Signature of ComplainantErik Diaz, HSI Special Agent
Printed Name of Complainant

Sworn to before me and signed in my presence,

October 7, 2015 8:46am At
DateMcAllen, Texas

City and State

U.S. Magistrate Judge, Peter Ormsby
Name and Title of Judicial Officer*Peter Ormsby*
Signature of Judicial Officer

Attachment "A"

On October 6, 2015, United States (U.S.) Customs and Border Protection Officers (CBPOs) at the Hidalgo, Texas Port of Entry (POE) encountered Javier LARA as he presented himself for inspection driving a Ford Escape. LARA was referred to secondary inspection after the vehicle he was driving returned with a possible link to narcotics smuggling.

At secondary inspection, the vehicle was x-rayed and anomalies were observed within the rear of the vehicle.

A search of the spare tire area of the vehicle revealed 10 bricks weighing approximately 10.68 kilograms in the spare tire area. The contents of the brick contained a substance which field tested positive for cocaine.

HSI Special Agents responded to the port to interview LARA. LARA was read his Miranda Rights from a pre-printed form in the English language. LARA waived his rights both orally and in writing by signing the pre-printed form.

LARA stated that approximately three months ago, he was approached by a friend and asked if he wanted to smuggle currency from Mexico to the U.S. LARA stated his friend offered to buy him a vehicle if he agreed to smuggle the currency into U.S., which he eventually agreed to.

LARA stated that prior to October 6, 2015, he had smuggled something into the U.S. six times. LARA stated he initially thought he was smuggling currency into the U.S., but became suspicious after a while. LARA stated he believed he was transporting cocaine or some type of illegal drugs. LARA stated he was paid \$500.00 U.S. dollars or \$5,000 Mexican pesos each time he successfully smuggled packages into the U.S.

LARA stated that on October 5, 2015, he lent his vehicle to his friend who recruited him. LARA believes it was at this time that the packages were concealed in his vehicle.

Special Agents requested and gained consent to search LARA's phone. Within the messages, Special Agents observed a conversation between LARA and another individual discussing the smuggling venture.